

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

ROBERT WITT,

Plaintiff,

v.

NOVARTIS PHARMACEUTICALS
CORPORATION,

Defendant.

No. 1:20-CV-01249

[PROPOSED] ORDER IMPLEMENTING FEDERAL RULE OF EVIDENCE 502(d)

As set forth below, the joint motion is **GRANTED**.

1. This Order shall be applicable to and govern all deposition transcripts and/or videotapes, and documents produced in response to requests for production of documents, answers to interrogatories, responses to requests for admissions, affidavits, declarations and all other information or material produced, made available for inspection, or otherwise submitted by any of the parties in this litigation as well as testimony adduced at trial or during any hearing (collectively “Information”).
2. The disclosure of privileged or work-product protected documents, electronically stored information (“ESI”) or Information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).
3. Nothing contained herein is intended to or shall serve to limit a party’s right to conduct a review of documents, ESI or Information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected Information before

production.

Accordingly, it is hereby **ORDERED**:

The Joint Motion for Entry of a 502(d) Order is **GRANTED**.

Dated: _____

Ellen Lipton Hollander
United States District Judge